



"Your Independent Community Bank"

EST. IN 1905

P.O. Box 110 Coldwater, Ohio 45828 www.pbcbank.com

September 16, 2005

FDIC, San Francisco Regional Office Director John F. Carter 25 Jessie St. at Ecker Square Suite 2300 San Francisco, CA 94105

Re: Wal-Mart Application #20051977 for an Insurance and Industrial Bank Charter

Dear Mr. Carter:

As a director of a small community bank, I can attest to the effect a Wal-Mart or Super Wal-Mart has on a rural community and county. When the Wal-Mart store opened in Celina, Ohio (our county seat), we slowly saw the decline of independent retail businesses in the downtown of Celina as well as Coldwater. A Super-Wal-Mart recently opened, replacing the old Wal-Mart and we anxiously await the decline of more independent businesses in our community.

If Wal-Mart is allowed a charter, no matter how narrowly it is defined, I see it as having a mushroom effect where eventually it will branch to stores nationwide and will undertake a broad range of banking and financial services. The impact on local, community banks will be devastating. I also feel that mixing banking and commerce is a poor public policy that could jeopardize the impartial allocation of credit and create conflicts of interest.

Our great nation has a long-standing principle of separating banking and commerce, as was reaffirmed in the Gramm-Leach-Bliley Act. We should not allow Wal-Mart, the world's largest commercial company, to breach this principle and threaten the stability of our economic and financial system.

Sincerely,

Floyd (d. Winner

Director

Co: FDIC, Chicago Regional Office

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Cc: Independent Community Bankers of America